

June 28, 1991

CD-91-02 (LD)

Dear Manufacturer:

SUBJECT: Carryover of 1992 MY Oil Survey Data

Provided for your information is a copy of a letter from the Motor Vehicle Manufacturers Association (MVMA) and response regarding carryover of oil survey data.

Sincerely,

Robert E. Maxwell, Director
Certification Division
Office of Mobile Sources

0105h

AFMC:TYREE:x310:lm:x467:2565 Plymouth Rd:06/26/91:CB#0105h

Mr. James P. Steiger, Director
Fuels, Lubricants & Special Projects
Motor Vehicle Manufacturers Association
7430 Second Avenue
Suite 300
Detroit, MI 48202

Dear Mr. Steiger:

Your correspondence of June 6, 1991 requested that EPA use the 1992 model year oil survey data for 1993 model year certification beyond.

We accept the technical justification set forth in your request as the basis for approving your request to use the 1992 oil survey for 1993 model year and beyond with the three exceptions you identified. As you recommended, and we concur, a new survey would be required any time one of three following events occur:

1. A change occurs in the performance category. For example, when API SF was upgraded to SG.
2. The test defining Energy Conserving II changes, which could change the value for some oils. Examples of such changes are new test procedures or a new test engine.
3. The viscosity guards recommendations are changed by the vehicles manufacturers (i.e., other than SAE 5W-30 or 10W-30).

We can accept these criteria because of the unlikelyhood of future formulation modification that would change the average improvement factor for EC II oils, along with the fact that the current average is very close to the bottom of the EC II range. If this situation changes, carryover may no longer be appropriate.

AFMC:Tyree:x310:sk:x581:2565 Plymouth Rd:06/27/91:CB#0106h

The correspondence approves the concept for carryover of 1992 oil survey data as outlined above. However, each manufacturer must make a specific request for use of the MVMA data. Each model year the manufacturer must attest that there has been no change in the three criteria which would result in a new survey and that the MVMA survey data is appropriate for their product offerings.

Sincerely,

Robert E. Maxwell, Director
Certification Division
Office of Mobile Sources

0106h

MOTOR VEHICLE MANUFACTURERS ASSOCIATION
of the United States. Inc.
7430 SECOND AVENUE. SUITE 300 DETROIT, MICHIGAN 48202 AREA
313-872-4311
TLX NO. 1009770 AUTOMAKERS DET. FAX NO. 313-872-5400

Thomas H. Hanna
President & Chief Executive Officer

June 6, 1991

Mr. Robert Maxwell,
Director Certification Division
U. S. Environmental Protection Agency
2565 Plymouth Road
Ann Arbor, Michigan 48105

Dear Mr. Maxwell:

For the past several years, MVMA member companies have conducted market surveys to determine the market average fuel economy improvement factor in accordance with letter CD-88-15 (LD). In the survey for 1992 model year certification, taken in mid1990, the averages were 3.0% for SAE 5W-30 and 2.8% for SAE 10W-30.

The purpose of this letter is to ask the EPA to allow the use of the survey used for 1992 acceptance for 1993 certification and beyond, until the market changes, as described below.

The fuel economy improvement factor for commercial oil remained fairly constant through the mid-1980's because no change in either the API performance level or the energy conserving properties of the oils occurred. In 1988, two separate things happened to change the market. Two new categories were created: API SG and Energy Conserving II. During the time between 1988 and now, the auto companies have made an annual survey of fuel economy oils.

Since the new categories have been in place for several years, the oil companies have settled on their product line. The likelihood of future changes in the fuel economy factors for "EC II" oils is low for two reasons. One is that the formulations have been optimized for performance and cost, so no one is likely to change. Two is that there is not a lot of room between the average and the floor value for "EC II," so a decrease would remove the oil from the vehicle makers recommendations and, consequently, from the survey.

MEMBERS:

CHRYSLER CORPORATION FORD MOTOR COMPANY GENERAL MOTORS
CORPORATION HONDA OF AMERICA MFG., INC.
NAVISTAR INTERNATIONAL TRANSPORTATION CORP PACCAR Inc VOLVO
NORTH AMERICA CORPORATION

Mr. Robert Maxwell

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June 6, 1991

Our recommendation for carrying out a new survey is to consider whether any of the following occurs:

1. A change occurs in the performance category. For example, when API SF was upgraded to SG.
2. The test defining Energy Conserving II changes, which could change the value for some oils. Examples of such changes are new test procedures or a new test engine.
3. The viscosity grade recommendations are changed by the vehicle manufacturers (i.e., other than SAE 5W-30 or 10W-30).

If any one of the three conditions is met, a new survey will be needed. Otherwise, the previous year's survey could be carried over.

Since none of the three conditions has occurred, we ask that the survey for the 1992 MY vehicles be carried over for 1993 MY vehicles.

In order to meet the timing requirements of one of our members, an answer is requested by June 14, 1991.

Very truly yours,

James P. Steiger,
Director Fuels, Lubricants & Special Projects

JPS:dl